

EXHIBIT 2

*REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED*

EXHIBIT 2

Boock, Todd A.

From: Boock, Todd A.
Sent: Thursday, August 31, 2017 1:09 PM
To: QE-Waymo
Cc: DG-GP Otto Trucking Waymo; UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit; John Cooper
Subject: RE: Waymo/Uber - Request for Meet and Confer

Waymo Counsel:

In reference to our discussion during the meet and confer with John Cooper, we would be willing to limit the depositions to 2.5 hours. Again, we would be willing to start with Fairfield and Bijnens to see if we needed more, of course reserving our rights to depose Sweeney and Krafcic, with an agreement with all parties to take them later if necessary (Waymo would not waive its right to object that we needed to do so).

Thanks.

Todd A. Boock



Goodwin Procter LLP
601 South Figueroa Street
Los Angeles, CA 90017
o +1 213 426 2560
f +1 213 289 7713
TBoock@goodwinlaw.com | goodwinlaw.com

From: Boock, Todd A.
Sent: Thursday, August 31, 2017 10:40 AM
To: QE-Waymo
Cc: DG-GP Otto Trucking Waymo; UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit; John Cooper
Subject: Waymo/Uber - Request for Meet and Confer

Waymo Counsel:

The attached newly produced document (WAYMO-UBER-000084602-08) reflects additional information pertaining to the involvement and relevant knowledge of individuals John Krafcic, Andrew Barton Sweeney and Nathaniel Fairfield, particularly as to Odin Wave and Tyto. In the other attached document (WAYMO-UBER-00006391-92), there is a [REDACTED] which was forwarded to Leah Bijnens. That document, in conjunction with 000084602-08, also indicates additional involvement and relevant knowledge of Leah Bijnens on similar issues. We request that the [REDACTED] and any other related and responsive e-mails that have not been produced be produced immediately. Also, we request depositions of Fairfield, Bijnens, Sweeney and Krafcic, but we would be willing to go with Fairfield and Bijnens as a start.

We request that this issue be discussed during the 11:30 a.m. meet and confer.

Thank you.

Todd A. Boock



Goodwin Procter LLP
601 South Figueroa Street
Los Angeles, CA 90017
o +1 213 426 2560
f +1 213 289 7713
TBoock@goodwinlaw.com | goodwinlaw.com